

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MARGARET E. DARGAN, a single person
and resident of the state of Oregon,

Plaintiff,

v.

GARY V. INGRAM, a Washington resident,
individually; PAMELA M. NODUS, a
Washington resident, individually; and the
marital community of GARY V. INGRAM and
PAMELA M. NODUS,

Defendants.

NO. 2:08-cv-01714-RSL

STIPULATION AND ORDER TO
EXTEND TEMPORARY
RESTRAINING ORDER

On June 22, 2017 at 3:20 p.m., the Court entered a Temporary Restraining Order (TRO) (Dkt. 96) restraining Defendants Gary Ingram and Pamela Nodus from transferring funds out of ten (10) identified accounts and any other undisclosed accounts and ordering Chase Bank, Wells Fargo Bank and U.S. Bank to freeze the identified accounts. The TRO was based in part on the Declaration of Robert Agnew (Dkt. 95), an investigator who conducted a search which resulted in identification of the ten (10) accounts frozen by the TRO. The TRO further provided:

This Order shall remain in place for 14 days from the date of filing. Defendants shall have until July 3, 2017, to file an opposition seeking to dissolve or modify the restraints imposed by this Order. If no opposition is filed, the motion will be converted to a preliminary injunction. If an opposition is filed, plaintiff may file a reply by noon on July 6, 2017.

STIPULATION AND ORDER FOR EXTENSION OF
TEMPORARY RESTRAINING ORDER- 1
(2:08-cv-01714-RSL)

BAROKAS MARTIN & TOMLINSON
ATTORNEYS AT LAW
1422 BELLEVUE AVENUE
SEATTLE, WASHINGTON 98122
TELEPHONE (206) 621-1871
FAX (206) 621-9907

1 For Defendant Ingram to adequately oppose the TRO and verify ownership of the
2 accounts in question requires obtaining documentation from U.S. Bank, Wells Fargo and Chase
3 Bank via subpoenas duces tecum. Defendant Ingram is immediately issuing said subpoenas for
4 service, but it is unlikely that the necessary bank records will be produced prior to Defendant
5 Ingram's opposition deadline of July 3, 2017.

6 Therefore, pursuant to Fed. R. Civ. P. 65(b)(2), Defendant Ingram consents to and
7 requests that the TRO be extended by an additional fourteen (14) days; that the opposition
8 deadline be extended to July 17, 2017; and that plaintiff's reply deadline be extended to noon on
9 July 20, 2017. Plaintiff agrees and stipulates to the entry of such an order.

10 RESPECTFULLY SUBMITTED this 27th day of June, 2017.
11

12 BAROKAS MARTIN & TOMLINSON

13 By: /s/ Abigail Z. Staggers
14 Abigail Z. Staggers, WSBA #43962
15 Attorneys for Defendant, Gary V. Ingram
16 1422 Bellevue Avenue
17 Seattle, WA 98122
18 Phone: 206-621-1871
19 Fax: 206-21-9907
20 Email: azs@bmatlaw.com

21 CAIRNCROSS & HEMPELMANN, P.S.

22 By: /s/ Lindsey M. Pflugrath
23 Lindsey M. Pflugrath, WSBA #36964
Attorneys for Plaintiff, Margaret E. Dargan
524 Second Avenue, Suite 500
Seattle, WA 98104
Phone: 206-587-0700
Fax: 206-587-2308
Email: lpflugrath@cairncross.com

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23

Dated this 28th day of June, 2017.

MRS Lasnik
Honorable Robert S. Lasnik
United States District Court Judge